

The Epstein Law Firm, P.A.

340 West Passaic Street
Rochelle Park, New Jersey 07662
www.theepsteinlawfirm.com

Tel (201) 845-5962
Fax (201) 845-5973

Barry D. Epstein *
Michael J. Epstein * √
April M. Gilmore * √

Michael A. Rabasca √
Jeffrey B. Richter

*Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney
√ Also Admitted in New York

Hon. John E. Selser (Ret.)
Counsel

June 1, 2021

Via ECF

Hon. James B. Clark, III, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Collick et al. v. William Paterson University et al.
Docket No. 16-471 (KM)

Dear Judge Clark:

As Your Honor knows, this office represents plaintiffs in the above matter. Currently pending before the Court are two motions: (1) defendants' motion for summary judgment as to all issues; and (2) the parties' single, consolidated motion to seal pursuant to Local Civil Rule 5.3(c)(2). The undersigned forwarded the parties' motion to seal to the Passaic County Prosecutor's Office, which provided many of documents that constitute the expansive motion record, so that it had the opportunity to address and/or oppose the relief sought. On May 27, 2021, I received an email from Mary Catherine Ryan, Chief Assistant Prosecutor requesting additional time to review the materials and proposed redactions, which are voluminous. Accordingly, with the consent of defendants' counsel, it is respectfully requested that the Court adjourn the pending motion to seal to June 21, 2021.

We thank Your Honor in advance for your anticipated attention and cooperation in this matter.

Respectfully submitted,

/s/ Michael A. Rabasca
MICHAEL A. RABASCA
mrabasca@theepsteinlawfirm.com

MAR/me
Cc: Matthew E. Beck, Esq.
Mauro G. Tucci, Esq.